



Transmitted Via E-Mail and Federal Express

January 15, 2004

J. Brian von Gunten
Project Manager
MDEQ-ERD
Superfund Section
Constitution Hall
525 W. Allegan St., 3rd Floor South
Lansing, MI 48933

Re: Draft Remedial Investigation/Focused Feasibility Study Report for the Willow Boulevard/A-Site Operable Unit
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Administrative Order by Consent between Michigan Department of Environmental Quality and Allied/HM Holdings, Inc., Georgia-Pacific Corporation, and Simpson Plainwell Paper Company. File No. DFO-ERD-91-001 dated December 28, 1990
BBL Project #: 645.81.500

Dear Brian:

On December 28, 2003, Blasland, Bouck & Lee, Inc. (BBL), on behalf of the Kalamazoo River Study Group (KRSG), received the Michigan Department of Environmental Protection's (MDEQ) latest draft of the Remedial Investigation/Focused Feasibility Study (RI/FFS) Report for the Willow Boulevard/A-Site Operable Unit (WB/A-Site OU) of the Kalamazoo River Superfund Site. Pursuant to Paragraph 36 of the Administrative Order by Consent (AOC) between the MDEQ and the members of the KRSG, we are invoking dispute resolution over the application of sediment cleanup objectives to soils, as described in the RI/FFS (e.g., page 6-8).

The application of sediment criteria for polychlorinated biphenyls (PCBs) established in the Baseline Ecological Risk Assessment for protection of aquatic ecosystems (0.5 – 0.6 milligrams per kilogram [mg/kg]) to soils that are, in theory, submerged as infrequently as once every 100 years is arbitrary. The sediment criteria referenced in the RI/FFS were developed as Preliminary Remediation Goals (PRGs) for sediments in the BERA to be protective of mink. A simple model of partitioning of PCB between sediment and the overlying water column and bioaccumulation in fish was used to calculate no-effect- and lowest-effect-based PRGs. This underlying model does not apply to soils that may only be submerged once every 100 years. The model is only reasonably applied to sediments in an aquatic ecosystem.

The KRSG's additional comments on the December 2003 draft RI/FFS for the WB/A-Site OU are attached (Attachment A) for your consideration.

The KRSG desires an efficient resolution of this dispute so the RI/FFS can be finalized and we can move forward implementing a final remedy at the WB/A-Site OU. Please call me if you have questions or would like to discuss the issues raised in this letter or in the attached comments.

Sincerely,

BLASLAND, BOUCK & LEE, INC.



Mark P. Brown, Ph.D.
Senior Vice President

MFE/tld
Enclosure

cc: Shari Kolak, United States Environmental Protection Agency
Bonnie A. Barnett, Esq., Drinker Biddle & Reath LLP
J. Michael Davis, Esq., Georgia-Pacific Corporation
Paul A. Montney, P.E., Georgia-Pacific Corporation
Joyce S. Schlesinger, P.E., ENVIRON
Patrick N. McGuire, Blasland, Bouck & Lee, Inc.